



**Liviu Vogel, Member**

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October 5, 2020

**VIA ECF**

The Honorable Loretta A. Preska  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 10007

Counsel's request to file certain exhibits in redacted for due to the inclusion of confidential financial and personal identifying information (dkt. no. 264) is granted. SO ORDERED.

 10/6/2020

**Re: *Peterson, et al. v. Islamic Republic of Iran, et al.*, No. 13-cv-9195 (LAP)**

Dear Judge Preska:

We are co-counsel to the Plaintiffs and write to request permission to file under seal Exhibits 84-86 to the Reply Declaration of Liviu Vogel that was filed on October 2, 2020 in further support of the Plaintiffs' Motion for Summary Judgment and Preliminary Injunction and in opposition to Motions of Bank Markazi and Clearstream Banking, S.A. (ECF No. 263). The subject exhibits have been redacted in part and filed in redacted form on the ECF docket in this case at the corresponding document numbers listed below:

EXHIBIT	ECF NO.
84	263-3
85	263-4
86	263-5

Consistent with Defendants' redactions to 26 of the exhibits annexed to my August 12, 2020 declaration, Exhibits 84-86 have been redacted solely to withhold from publication third-party financial information and personal identifying information that Defendants have designated confidential pursuant to various protective orders entered in *Peterson v. Islamic Republic of Iran*, S.D.N.Y Case No. 10-cv-4518 (copies of which were annexed to Plaintiffs' August 28, 2020 sealing motion (ECF # 234)). Defendants contend that the personal identifying information is potentially subject to foreign privacy laws.

Redacted and un-redacted copies of the above-listed exhibits will be submitted for Your Honor's review via an FTP link in an email to [PreskaNYSDChambers@nysd.uscourts.gov](mailto:PreskaNYSDChambers@nysd.uscourts.gov).

Respectfully submitted,

/s/ Liviu Vogel

CC: All counsel (via ECF)